

EXHIBIT 6

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
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3 AUTHORS GUILD, *et al.*,

4 Plaintiffs,

5 v.

23 Civ. 8292 (SHS) (OTW)

6 OPENAI, INC., *et al.*,

Conference

7 Defendants.
8 -----x

9 JULIAN SANCTON, *et al.*,

10 Plaintiffs,

11 v.

23 Civ. 10211 (SHS) (OTW)

12 OPENAI, INC., *et al.*,

13 Defendants.
14 -----x

15 THE NEW YORK TIMES COMPANY,

16 Plaintiff,

17 v.

23 Civ. 11195 (SHS) (OTW)

18 MICROSOFT CORPORATION, *et al.*,

19 Defendants.
20 -----x

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NICHOLAS A. BASBANES, et al.,

Plaintiffs,

v.

24 Civ. 00084 (SHS) (OTW)

MICROSOFT CORPORATION, et al.,

Defendants.

-----x

APPEARANCES

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1 fact that they are only requesting these custodians for a
2 limited number of search terms. That is good. We appreciate
3 that. But it overlooks the cost associated with adding a
4 custodian in the first place.

5 In order to make somebody a custodian, The Times has
6 to go collect all of their documents. Even to run search terms
7 to get hit counts, The Times has to do that because,
8 unfortunately, The Times is not available or able, due to the
9 software that it uses, to run search terms in the native
10 environment. We have to actually go collect all of those,
11 deliver them to the document vendor, and have them do it. We
12 have looked into switching that software, and, unfortunately,
13 cannot do so on a timeline that is useful to this litigation.
14 But we did see if that was an option.

15 And that process of collecting all of someone's
16 documents is not just e-mail, although that is a big piece.
17 There is e-mail/shared drives, personal drives, scanning the
18 mobile device, scanning their hard drive, photocopying their
19 hard copy documents, if they have those. All of that is part
20 of that collection process.

21 And I reached out to our vendor to ask, what is the
22 estimated cost per person just to complete on your end that
23 collection, processing, loading, staging of data, to run search
24 terms. And the answer I got was about \$46,000 per person.

25 (Continued on next page)